

NOTICE OF OBJECTION TO CONFIRMATION

WELLS FARGO BANK, N.A. has filed papers with the Court to object to the Confirmation of the Chapter 13 Plan.

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)**

If you do not want the Court to object to the Confirmation of the Chapter 13 Plan, or if you want the Court to consider your views on the Objection, then on or before December 12, 2018, you or your attorney must:

File with the Court an answer, explaining your position at:

**Clerk  
U.S. Bankruptcy Court  
401 Market Street, 2nd Floor  
Camden, NJ 08101**

If you mail your response to the Court for filing, you must mail it early enough so that the Court will **receive** it on or before the date stated above.

You must also mail a copy to:

PHELAN HALLINAN DIAMOND & JONES, PC  
400 FELLOWSHIP ROAD, SUITE 100  
MT. LAUREL, NJ 08054

ISABEL C. BALBOA, TRUSTEE  
CHERRY TREE CORPORATE CEN, 535 ROUTE 38 -  
SUITE 580  
CHERRY HILL, NJ 08002

Attend the hearing scheduled to be held on December 19, 2018 at 10:00 AM in the CAMDEN Bankruptcy Court, at the following address:

**U.S. Bankruptcy Court  
401 Market Street, 2nd Floor  
Camden, NJ 08101**

If you or your attorney do not make these steps, the Court may decide that you do not oppose the relief sought in the Objection and may enter an Order granting that relief.

Date: December 5, 2018

/s/ Sherri J. Smith  
Sherri J. Smith, Esq.  
Phelan Hallinan Diamond & Jones, PC  
400 Fellowship Road, Suite 100  
Mt. Laurel, NJ 08054  
Tel: 856-813-5500 Ext. 47923  
Fax: 856-813-5501  
Email: Sherri.Smith@phelanhallinan.com

**File No. 818323**

Phelan Hallinan Diamond & Jones, PC  
400 Fellowship Road  
Mt. Laurel, NJ 08054  
856-813-5500  
FAX Number 856-813-5501  
WELLS FARGO BANK, N.A.

In Re:	UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF NEW JERSEY CAMDEN VICINAGE
VANESSA JONES	Chapter 13
Debtors	Case No. 18-12395 - JNP

Hearing Date: December 19, 2018 at 10:00 AM

The undersigned, Phelan Hallinan Diamond & Jones, PC, attorneys for Secured Creditor, WELLS FARGO BANK, N.A., the holder of a Mortgage on debtors residence located at 121 ISABELLA DRIVE, GLASSBORO, NJ 08028 hereby objects to the Confirmation of the debtors proposed Chapter 13 Plan on the following grounds:

1. Movant is WELLS FARGO BANK, N.A.
2. Debtors, LEIF JONES, VANESSA JONES are the owners of the property located at 121 ISABELLA DRIVE, GLASSBORO, NJ 08028.
3. Debtor's plan provides for the monthly post-petition mortgage payment of \$1,428.51. Movant objects to the Post-Petition mortgage payment as the actual payment amount is \$1,793.78.
4. Additionally, Debtor's Plan fails to provide for the full monthly post-petition payment owed to Movant under the terms of the Note and Mortgage. Movant objects to any post-petition payment amount less than 100% of what is required. Accordingly, confirmation of Debtor's proposed Plan should be denied

WHEREFORE, WELLS FARGO BANK, N.A. respectfully requests that the Confirmation of Debtors Plan be denied.

/s/ Sherri J. Smith  
Sherri J. Smith, Esq.  
Phelan Hallinan Diamond & Jones, PC  
400 Fellowship Road, Suite 100  
Mt. Laurel, NJ 08054  
Tel: 856-813-5500 Ext. 47923  
Fax: 856-813-5501  
Email: Sherri.Smith@phelanhallinan.com

Dated: December 5, 2018

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY	
<b>Caption in Compliance with D.N.J. LBR 9004-1(b)</b>	
818323 Phelan Hallinan Diamond & Jones, PC 400 Fellowship Road, Suite 100 Mt. Laurel, NJ 08054 856-813-5500 Attorneys for WELLS FARGO BANK, N.A.	
In Re:	Case No: 18-12395 - JNP
VANESSA JONES	Hearing Date: December 19, 2018 at 10:00 AM
	Judge: JERROLD N. POSLUSNY JR.
	Chapter: 13

### **CERTIFICATION OF SERVICE**

1. I, ALEXIS FISHER:

represent the \_\_\_\_\_ in the above-captioned matter.

am the secretary/paralegal for Phelan Hallinan Diamond & Jones, PC, who represents WELLS FARGO BANK, N.A. in the above captioned matter.

am the \_\_\_\_\_ in the above case and am representing myself.

2. On December 7, 2018 I sent a copy of the following pleadings and/or documents to the parties listed below:

Objection to Plan

3. I hereby certify under penalty of perjury that the above documents were sent using the mode of service indicated.

Dated: December 7, 2018

/s/ ALEXIS FISHER  
ALEXIS FISHER

Name and Address of Party Served	Relationship of Party to the Case	Mode of Service
VANESSA JONES 121 ISABELLA DR. GLASSBORO, NJ 08028	DEBTOR	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by the court *)
VICTOR DRUZIAKO, ESQUIRE LAW OFFICE OF VICTOR DRUZIAKO, PC 1882 W LANDIS AVENUE VINELAND, NJ 08360	DEBTOR'S ATTORNEY	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by the court *)
ISABEL C. BALBOA, TRUSTEE CHAPTER 13 STANDING TRUSTEE CHERRY TREE CORPORATE CENTER 535 ROUTE 38 - SUITE 580 CHERRY HILL, NJ 08002	TRUSTEE	<input type="checkbox"/> Hand-delivered <input type="checkbox"/> Regular Mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by the court *)
RAYMOND SHOCKLEY, JR, ESQUIRE OFFICE OF THE CH. 13 STANDING TRUSTEE 535 ROUTE 38 SUITE 580 CHERRY HILL, NJ 08002	OFFICE OF THE CH. 13 STANDING	<input type="checkbox"/> Hand-delivered <input type="checkbox"/> Regular Mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by the court *)

<p>U.S. TRUSTEE US DEPT OF JUSTICE OFFICE OF THE US TRUSTEE ONE NEWARK CENTER STE 2100 NEWARK, NJ 07102</p>	<p>U.S. TRUSTEE</p>	<p><input type="checkbox"/> Hand-delivered <input type="checkbox"/> Regular Mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by the court *)</p>
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\* May account for service by fax or other means as authorized by the court through the issuance of an Order Shortening Time.